

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

**MDL NO. 16-2738 (MAS) (RLS)**

**THE PLAINTIFFS' STEERING COMMITTEE'S CERTIFICATE OF  
EXHIBIT TO BE UNDER SEAL**

PLEASE BE ADVISED, the Plaintiffs' Steering Committee's Letter to Judge Michael A. Shipp and Judge Rukhsanah L. Singh (Doc. 27756) should be public and the accompanying Exhibit A (Doc. 27756-1) should be marked confidential material. Counsel respectfully requests that the restriction be removed from the letter, but stay in place for the accompanying exhibit.

Exhibit A to the Plaintiffs' Steering Committee's letter is a Declaration by Professor Lynn Baker, the Frederick M. Baron Professor of Law at the University of Texas School of Law. Professor Baker is an expert in legal ethics. The Declaration contains Professor Baker's analysis of the potential appointment of Freda L. Wolfson, U.S.D.J. (ret.) for the limited purpose of addressing *Daubert*-related disputes and motions in this matter.

Dated: September 19, 2023

Respectfully Submitted,

/s/ Michelle A. Parfitt

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***Plaintiffs' Liaison Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

*s/ P. Leigh O'Dell*

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P. Leigh O'Dell